

Privacy Policy

Waystone Fund Services (Switzerland) SA

Introduction

This Privacy Notice explains the types of personal data that Waystone Fund Services(Switzerland) SA ('Waystone', 'we') may collect about individuals. It also explains how we'll store and handle that data and keep it safe. In compliance with articles 13 and 14 of the General Data Protection Regulation ('GDPR'), this notice informs you about:

- the identity and the contact details of the controller;
- the contact details of the data protection officer;
- the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- the legitimate interests pursued by the controller or by a third party;
- the recipients or categories of recipients of the personal data.

The legal bases we rely on for collecting personal data

With effect from 25th May 2018, the General Data Protection Regulation sets out a number of different reasons for which a business may collect and process personal data. These include:

- Consent – In specific situations, we can collect and process data with consent e.g. when an individual indicates that they want to be added to our marketing list(s).
- Contractual obligations – In certain circumstances, we need personal data to comply with our contractual obligations.
- Legal compliance – If the law requires us to, we may need to collect and process personal data.
- Legitimate interest – In specific situations, we require personal data to pursue our legitimate interests as part of running our business.

When do we collect personal data?

- When an individual contacts us by email, post etc.
- When an individual has given a third party permission to share that individual's personal data with us.
- When we collect personal data e.g. names, email addresses, contact telephone numbers, which are publicly available on other company websites, as part of our market research.
- When we collect personal data e.g. ID documents, date of birth, as part of our due diligence and onboarding process on the funds we represent.
- When an individual participates in our capital introduction events.

What sort of personal data do we collect?

- As part of our due diligence and on boarding processes, we may collect some or all of the following: name, email address, date of birth, nationality, signature, telephone number, professional or employment related information, photographic identification and verification such as copies of your passport, passport number and driver's license, information relating to your status as an ultimate beneficial owner of an entity, a politically exposed person or a designated individual on a sanctions list..
- Details about potential employees obtained from referees.
- Names, photos and email of participants to our capital introduction events.
- Names and photos of speakers at our capital introduction events and names of their companies.

How and why do we use personal data?

- To perform the due diligence and onboarding process on the funds that ask us for representation services.
- For recruitment purposes.
- To respond to queries, questions or complaints.
- Photos of participants to capital introduction events and names of speakers and their companies may be used for marketing purposes on Waystone's website, brochure and social media posts.
- Email and names of participants to capital introduction events may be shared with the event speakers for the purpose of following up by email after the event.

How we protect personal data

We will treat personal data with the utmost care and take all appropriate steps to protect it, in accordance with our data security policy.

How long will we keep personal data?

Whenever we collect or process personal data, we'll keep it for as long as is relevant for the purpose for which it was collected.

Who do we share personal data with?

We will never share your personal data with third parties for the purposes of marketing, with the exception of photos, names and contacts of participants to capital introduction events, names of speakers and their companies, in the ways outlined above.

We may need to share some information of our clients with other companies in the Waystone Group for the purpose of due diligence and onboarding.

We may also need to share contact information of our clients in the framework of establishing business contracts between the client and third-party service providers (e.g., paying agents, placement agents).

What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge.
- The correction of your personal data when incorrect, out of date or incomplete.

- Withdrawal of your consent for use of your personal data.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- The deletion of your personal data.

Contacting the regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with your local data protection supervisory authority.

In Switzerland, the supervisory authority is the Federal Data Protection and Information Commissioner:

Federal Data Protection and Information Commissioner

Feldeggweg 1

CH-3003 Berne

+41 (0)58 462 43 95

Contact form:

<https://www.edoeb.admin.ch/edoeb/fr/home/le-pfpdt/contact/formulaire-de-contact.html>

If you have any questions

Email us at dataprotection@waystone.com or write to us at Waystone – Data protection, Avenue Villamont 17, 1005 Lausanne, Switzerland.